

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JPMORGAN CHASE BANK,
N.A.,**

Plaintiff,

v.

TIMIPAH IKEMI,

Defendant.

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Civil Action No. 4:24-cv-04140

PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff JPMorgan Chase Bank, N.A. (“**Chase**”) files this *Request for Entry of Default* against Defendant Timipah Ikemi (“**Defendant**”), and respectfully states as follows:

1. A party defaults when, although being properly served, it fails to file a responsive pleading or otherwise defend the lawsuit. FED. R. CIV. P. 55(a). Once the plaintiff shows the defendant’s failure to respond by affidavit or otherwise, the clerk must enter the party’s default. FED. R. CIV. P. 55(b); *N.Y. Life Ins. Co. v. Brown*, 84 F.3d 137, 141 (5th Cir. 1996) (“A default occurs when a defendant has failed to plead or otherwise respond to the complaint within the time required by the Federal Rules.”).

2. On October 28, 2024, Chase filed its Original Complaint against Defendant. [Dkt. 1.] The Court issued a Summons to Defendant on the same day. [Dkt. 4.]

3. On December 9, 2024, Defendant was served with the Summons and the Complaint. [Dkt. 7.] On December 11, 2024, Chase filed the Affidavit of Service. [*Id.*]

4. Defendant's deadline to answer or otherwise respond to the Complaint was December 30, 2024. *See* FED. R. CIV. P. 12(a)(1)(A)(i).

5. Defendant has failed to respond to the Complaint or otherwise appear in this lawsuit. Accordingly, Defendant is in default, and Chase thus requests an entry of default against Defendant.

6. Defendant is not an infant or incompetent person, nor is he in military service. *See* Exhibit A, Declaration of Christina M. Carroll.

CONCLUSION

For these reasons, Plaintiff JPMorgan Chase Bank, N.A. requests that the Clerk of Court enter a default against Defendant Timipah Ikemi.

[Signature Page Follows]

Dated: January 28, 2025

Respectfully submitted,

/s/ Christina M. Carroll

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Attorneys for Plaintiff

JPMorgan Chase Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being served on Defendant Timipah Ikemi by U.S. certified mail, return receipt requested as follows:

Timipah Ikemi
6322 Ludington Drive
Houston, Texas 77035

/s/ Morgan E. Jones

Morgan E. Jones